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July 14, 2023

The Honorable Vera M. Scanlon
United States Magistrate Judge
U.S. District Court for the Eastern District of New York
Brooklyn, New York 11201

Re: *Henkin, et al. v. Qatar Charity, et al.*, 1:21-cv-05716-AMD-VMS

Dear Judge Scanlon:

We write in response to Plaintiffs' letter dated July 12, 2023, ECF No. 107 (the "July 12 Letter"), ostensibly seeking "correction of an apparent error in the Court's July 8, 2023 decision and order" (the "Order"). Qatar Charity and Masraf al Rayan ("MAR" and, together with Qatar Charity, the "Defendants") object to the July 12 Letter as Plaintiffs failed to meet and confer, and now improperly seek to relitigate the very issues that have already been briefed by the parties. Moreover, although the July 12 Letter is confusing, it appears to contradict the very demands that they proposed. Accordingly, the requests contained in the July 12 Letter should be denied.

For the avoidance of doubt and to address Plaintiffs' counsel's concerns, Defendants understand the Order to require the production of information and documents responsive to Plaintiffs' modified interrogatories and requests for production (*see* ECF Nos. 96-3, 96-4) to the extent that they inquire as to U.S. dollar-denominated transfers to the Palestinian Territories, made by MAR on behalf of Qatar Charity and involving a N.Y. Correspondent Account (at whatever bank in New York), between October 1, 2012, and September 16, 2018. As to the concerns raised on page 2 of the July 12 Letter, the Defendants intend to produce account-opening agreements regarding any Qatar Charity MAR account that was (in Plaintiffs' words) "in fact used to originate [such a transfer] using one of MAR's N.Y. Correspondent Accounts." (July 12 Letter at 2). From our perspective, the Defendants do not think that any further action by the Court is required.

Respectfully submitted,

/s/

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/s/

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cc: All counsel of record (by ECF)